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COACHELLA VALLEY FARMERS EDUCATIONAL MEETING

IN THE MATTER OF: .
CONSERVATION SECURITY PROGRAM .
LISTENING SESSION .
PUBLIC COMMENTS ONLY .
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PARTIAL TRANSCRIPT OF PROCEEDINGS
TAKEN AT UNIVERSITY OF CALIFORNIA-FRESNO CENTER
550 EAST SHAW AVENUE
FRESNO , CALIFORNIA 93710
THURSDAY, FEBRUARY 19, 2004

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1 FRESNO, CALIFORNIA, THURSDAY, FEBRUARY 19, 2004

2 PROCEEDINGS IN PROGRESS, PUBLIC COMMENTS BEGIN

3 MS. FULLERTON: I guess I'm the lucky one. I'm Karla
4 Fullerton. I actually represent the Fresno County Farm Bureau
5 which has over six thousand members here in Fresno County alone
6 and is the largest agricultural producing county in the country
7 and in the world.

8 We have several concerns. And first and foremost is
9 the fact that the goal of this program is to make farmers
10 economically and environmentally sustainable, yet you only hear
11 about the, the process understanding and developing, talking
12 about watershed criteria. It doesn't talk about the
13 complexities of all environmental issues and those impacts on
14 entire farming communities. And I think that's very, very
15 short cited. It's a simplistic way for the -- for NRCS to
16 implement a program, but are you gonna really get and tackle
17 what the intent of the actual law was.

18 And my concern is here in this area it isn't just
19 water quality and soil quality that are our concerns. We have
20 multiple layers of air quality concerns, ESA concerns, we have
21 nutrient management concerns, all of which affect the entire
22 environmental area. And that is left out. And as you go and
23 prioritize watersheds as it's currently written in the rule
24 you're not gonna get to an area like mine that has an entire
25 complex environmental integration, not only with farming, but

1 with an urban populace interface as well. And it is a shame
2 that those areas where we are at the forefront of cutting edge
3 environmental integration economically hugely impacted by our
4 environmental programs and environmental regulations literally
5 driving farmers under, that this program is not gonna get to
6 those farmers who are trying to do the right thing, trying to
7 survive in a very burdensome environment. And those -- in my
8 opinion, that was what the bill was written for, is to get to
9 folks like my folks that are trying to deal with not one issue
10 or two issues that may be the priority in a watershed, but in
11 fact looking at an entire environmental program and how you
12 integrate all elements so that they're not competing. And that
13 is probably the biggest concern and short-sidedness of this
14 program.

15 Again, we have concerns with basing everything on a
16 watershed priority basis. In fact, I think it's a bigger
17 problem. It's not watershed by watershed. It's environmental
18 geographic area by geographic area. And assumption is the
19 Klamath Basin where they have not only water quality and water
20 supply issues, they have ESA issues, those things, there's a
21 lot of areas that are under siege with environmental impacts.
22 You want to encourage folks. You want them to remain in the
23 agricultural industry, yet the program that's developed to help
24 those folks is never gonna get to those priority watersheds.
25 The way I look at it as priority watersheds are designed, in

1 fact what you're gonna do by taking the worst watershed is
2 you're actually gonna get watersheds that are tremendously
3 urban based because when you look at worst watersheds in the
4 nation you're gonna look at highly impacted urban interface
5 programs, and you're gonna get to -- in fact, you may get to a
6 smaller farmer which may be good, but are you actually gonna
7 help clean up that system when you're only engaging, most
8 likely, a very small percentage of what the impact to that
9 watershed is, because most likely it's the urban interface
10 that's creating the bigger watershed problem, and you're gonna
11 tackle the smaller part of the watershed problem.

12 Again, very concerned that it doesn't want to look at
13 the complexity of all environmental issues and instead strictly
14 pulls out soil and water quality as the basis of where priority
15 funding gets to.

16 Again, one of my other concerns is the definition of
17 agricultural operation. And -- and my presumption or my
18 recommendation is, is that you truly can't look at an entity
19 that has multiple controls or multiple partners. What you need
20 to look at is that entity and the decision making authority
21 that that entity has over property. If they have sole decision
22 making authority then maybe they should be held to those
23 standards on the properties of which they have sole decision
24 making priority. But you can't hold them and say you can't
25 meet a Tier II or Tier III level because your partner doesn't

1 agree and that you have to share that decision making process
2 with a partner. Very, very disconcerting.

3 Again, also, the definition of holding your -- or
4 having full control of the land for five years or five to ten
5 years is also very concerning. In fact, we have on -- or an
6 ongoing basis of short term lease agreements that traditionally
7 happens in areas such as ours, again, where there's an urban
8 interface and spear type growing where you just never know
9 what, what they want to do. It doesn't mean that they're --
10 the lease is not gonna be renewed, it's just unusual
11 circumstances that may come up.

12 The other thing that isn't addressed is what happens,
13 and I assume it's transferable, but what happens if the land is
14 sold and is there retributions of payback? What are those
15 consequences? Don't seem to be clearly spelled out.

16 I think that's most of my major concerns. Again, I
17 think it really should have been -- the program was -- should
18 have been focused specifically on states that have duplexing
19 and multiple complex issues and how they're gonna get at those
20 complexities of issues. I think the program also doesn't do
21 much for incentivizing folks that are on the cutting edge and
22 stepping up and coming with new solutions that may not be in
23 field office technical guides.

24 One of the examples is the CMP program, the
25 agriculture industry. We're in the front of NRCS and actually

1 helping NRCS develop field office technical guides for air
2 quality. There are issues that NRCS doesn't have regulations.
3 It shouldn't kick us out because you guys haven't created 'em.
4 In fact, it should push us up forward because we're helping
5 addressing those issues that have not been addressed in the
6 past and should be -- have a priority in those areas that are
7 emerging that may help NRCS actually prepare for the future.

8 And I think this is retrospective, the way the rule
9 is written, where we're gonna go back to what we've been doing
10 rather than looking and helping folks progress and move forward
11 with new areas, new innovative ideas. And I think that that's
12 one of the things that you want to incentivize in Tiers II and
13 III even stronger than what is seen here today, so.

14 PUBLIC COMMENTS CONCLUDED

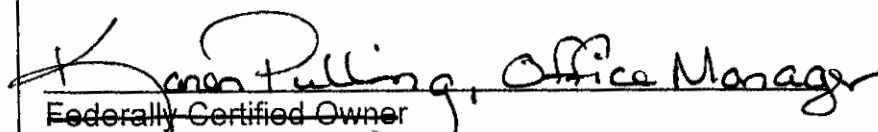
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